

**Before the
Federal Communications Commission**

In the Matter of)	
)	
Telecommunications Relay Services and)	CGB Docket No. 03-123
Speech-To-Speech Services for)	
Individuals with Hearing and Speech)	
Disabilities)	

**Reply Comments of
The American Association of People with Disabilities (AAPD)**

The American Association of People with Disabilities (AAPD)¹ is pleased to take this opportunity to provide brief recommendations in regard to assigning Internet protocol-based Telecommunications Relay Service (TRS) and video relay service (VRS) users ten-digit telephone numbers linked to the North American Numbering plan.

AAPD is very interested in efforts to improve and expand communications access over the Internet that would benefit people with disabilities. In coalition with over 180 disability organizations and related entities,² we advocate actively to ensure that legislative and regulatory

¹The American Association of People with Disabilities (AAPD) is the largest national nonprofit cross-disability member organization in the United States, dedicated to organizing the disability community to be a powerful force for change socially, politically and economically. AAPD works in coalition with other disability organizations for the full implementation and enforcement of disability nondiscrimination laws, particularly the Americans with Disabilities Act (ADA) of 1990 and the Rehabilitation Act of 1973, as well as other statutes, such as the disability accessibility mandates in the Communications Act.

² See primary goal of the Coalition of Organizations for Accessible Technology (COAT), at <http://www.coataccess.org/node/51>, April 17, 2008. AAPD is a founding and steering committee member of COAT.

safeguards are in place so people with disabilities have access to evolving high speed broadband, wireless, and other Internet-based technologies.

AAPD believes that the Commission should not take any action that could limit communication access in any way by making it difficult for hearing users to use telephone numbers to call persons who are deaf, persons who are hard of hearing or persons with speech disabilities either directly or through relay services. We, therefore, support an open system of numbering that is accessible to anyone, independent of the equipment used by that individual and one that would promote interoperability of equipment and that does not tether the user to specific equipment provided by any provider.

To this end, and after a review of some of the Comments in the record in regard to this matter, AAPD recommends the following principles be used in developing a numbering system for Internet Protocol-based TRS and VRS users :

- *Open*: Accessible to any provider and independent of the equipment used by callers.
- *Interoperable*: Provides for people who are deaf, hard of hearing, or with speech disabilities, and hearing callers, to use ten-digit numbers to make IP-based relay and point-to-point calls to and from any other individuals who use IP-based forms of communications, regardless of the equipment used by either party to the call.

- *Fair distribution*: Enables the distribution of numbers in a fair and competitive manner, such as through a central, neutral third party.
- *Non-tethered devices*: Does not limit distribution of phone numbers for users to IP-based providers that supply end user video devices that can be tied to those numbers.
- *Number portability*: Provides for full and functionally equivalent numbering portability.
- *Privacy*: Does not track any point-to-point calls nor does it track relay calls not handled by the providers of those calls.
- *Built on existing Internet structure*: Uses the already established Domain Name System (DNS) of the Internet, that stores information about host names and domain names via a distributed database on networks, and that is robust enough to provide address resolution on the Internet.
- *Consistent*: Is consistent with previous principles and policies the FCC has established for relay service, specifically in such areas as interoperability of VRS devices, confidentiality of content of phone calls, and interconnection with other phone networks and systems.
- *Includes outreach and consumer education*: Any numbering system once established should incorporate an outreach component with easy-to-understand information on how to obtain a telephone number and related requirements.

We believe our recommendations align with the principles of “functional equivalence” and “to the extent possible and in the most efficient manner” found in the statute for telecommunications relay services.

Thank you for considering our recommendations.

Respectfully submitted,

Jenifer Simpson

Jenifer Simpson

Senior Director, Telecommunications and Technology Policy Initiatives

American Association of People with Disabilities (AAPD)

1629 K Street, NW, Suite 503

Washington, DC 20006

Tel: 202-457-0046 Ext 31; Fax: 202-457-0473; Email aapdjenifer@aol.com

Stay in the loop with disability news! Sign up to receive Justice For All (JFA) free news Email service at <http://www.aapd.com/JFA/index.php>